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7 Attorneys for Nelson Mauricio Tario

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA
10

11 * * *

12 UNITED STATES OF AMERICA,

Case No.: 2:14-mj-302-NJK

13 Plaintiff,

14 vs.

15 NELSON MAURICIO TARIO,

16 Defendant.

STIPULATION AND PROPOSED
ORDER TO MODIFY THE
CONDITIONS OF PROBATION

17 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United
18 States Attorney, and Nadia Janjua Ahmed, Assistant United States Attorney, counsel for the United
19 States of America, and Rene L. Valladares, Federal Public Defender and Heidi A. Ojeda, Assistant
20 Federal Public Defender, counsel for NELSON MAURICIO TARIO, that the conditions of Mr.
21 Tario's probation be modified to allow travel back and forth to California to visit his children twice
22 a month.

23 This Stipulation is entered into for the following reasons:

24 1. On March 11, 2015, Mr. Tario was sentenced to 18 months probation with special
25 conditions. Immediately after court, he went over to the probation office to fill out the initial
26 paperwork. While there, he informed the duty officer that he had pre-planned to travel to California
27 the weekend of March 14-15, 2015, to visit his children and that he tries to travel to California to
28 visit his children at least twice a month.

1 2. The probation department's policy is to disallow travel within the first 90 days of
2 supervision, absent the Court's permission. Undersigned counsel for the defendant therefore requests
3 the Court modify Mr. Tario's conditions of probation to allow his travel to California on March
4 14-15, 2015. Further, undersigned counsel for the defendant requests the Court modify his
5 conditions to allow Mr. Tario to be able to travel to California to visit his children at least twice a
6 month.

7 3. The Government does not oppose either requested modification.

8 DATED this 12th day of March, 2015.

9 RENE L. VALLADARES
10 Federal Public Defender

DANIEL G. BOGDEN
United States of America

11 By: /s/ Heidi A. Ojeda
12 HEIDI A. OJEDA
Assistant Federal Public Defender

By: /s/ Nadia Janjua Ahmed
NADIA JANJUA AHMED
Assistant United States Attorney

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,

Case No.: 2:14-mj-302-NJK

Plaintiff,

ORDER

vs.

NELSON MAURICIO TARIO,

Defendant.

ORDER

IT IS HEREBY ORDERED, that the conditions of Mr. Tario's probation be modified to allow him to travel to California March 14-15, 2015 and to allow his travel back and forth to California twice a month to visit his children.

DATED this _ 12th _ day of March, 2015.


UNITED STATES MAGISTRATE JUDGE